

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: ANNA M YOCUM

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant  
vs.  
ANNA M YOCUM

CASE NO: 1-23-01674-HWV

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on February 27, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney Douglas R. Roeder, Esquire, and respectfully represents the following:

1. An Amended Plan was filed on October 23, 2023.
2. A hearing was held and an Order was entered on January 24, 2024 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire  
Id: 80016  
Attorney for Movant  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: 717-566-6097  
email: droeder@pamd13trustee.com

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**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 4B  
1501 North 6th Street  
Harrisburg, PA 17102

Date: March 27, 2024

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: February 27, 2024

/s/ Douglas R. Roeder, Esquire  
Id: 80016  
Attorney for Trustee  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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vs.

ANNA M YOCUM

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on February 27, 2024, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served electronically

JERRY A. PHILPOTT, ESQUIRE  
227 N HIGH ST  
PO BOX 116  
DUNCANNON, PA 17020

UNITED STATES TRUSTEE  
1501 NORTH 6TH STREET  
BOX 302  
HARRISBURG, PA 17102

Served by 1<sup>st</sup> Class Mail

ANNA M YOCUM  
437 LINTON HILL ROAD  
DUNCANNON, PA 17020

I certify under penalty of perjury that the foregoing is true and correct.

Date: February 27, 2024

/s/ Vickie Williams

Office of Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.